



**BUFFALO PUBLIC SCHOOLS**  
**Office of Legal Counsel**  
**65 Niagara Square, Room 713 City Hall**  
**Buffalo, New York 14202**  
**Phone (716) 816-3102**  
**Fax (716) 851-3030**  
[requinn@buffaloschools.org](mailto:requinn@buffaloschools.org)

**Nathaniel J. Kuzma**  
**General Counsel**

April 14, 2022

HON. STEWART D. AARON  
United States Magistrate Judge  
United States District Court  
500 North Pearl Street, Room 2260  
New York, NY 10007

*Re: United States of America and States of the United States, ex rel.  
Donoghue v. Richard Carranza, et al., No. 1:20-cv-5396 (GWH)(SDH)*

Dear Magistrate Judge Aaron:

I am counsel for the Defendants Buffalo Public School District and Kriner Cash, in his official capacity as Superintendent, in the above action.

Pursuant to Rule 1.E of Your Honor's Individual Rules for Practice for Civil Cases, I submit this letter to request a second extension of time, to April 29, 2022, for the Buffalo Public School District and Kriner Cash to answer or respond to Plaintiffs' Second Amended Complaint (Dkt. 19). The answer or response is currently due on April 15, 2022. There has been one prior request for an extension, which was granted (Dkt. 105), and we do not anticipate any further requests for extension. The reason for this second request is to allow counsel to evaluate the Second Amended Complaint with their clients and prepare a response which, unforeseeably, has been delayed an attorney leaving our office to take another position and other recent staff and administrative changes in the Buffalo School District.

Counsel for Realtor was contacted on Thursday, April 14, 2022, regarding this request and he advised that his is not opposed to the extension request. Please contact my direct extension, (716) 851-4326, should there be any questions. Thank you for your courtesies.

Respectfully yours,

NATHANIEL KUZMA, ESQ.  
General Counsel

/s/ Robert E. Quinn

By: Robert E. Quinn  
Assistant Legal Counsel

CC: All Counsel (by ECF)